

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: Michael William Croutz and Christen Marie Croutz Debtors	Case No. 1:20-bk-01617-HWV
Rushmore Loan Management Services, LLC as Servicer for U.S. Bank National Association, not in its individual capacity but solely as trustee for RMTP Trust, Series 2021 Cottage-TT-V	Chapter: 13
Movant	Judge: Henry W. Van Eck
v.	
Michael William Croutz and Christen Marie Croutz Jack N Zaharopoulos – Trustee, Respondents	

NOTICE OF APPEARANCE

PLEASE TAKE NOTICE that the undersigned hereby appears in the above-captioned Chapter 13 case on behalf of Rushmore Loan Management Services, LLC as Servicer for U.S. Bank National Association, not in its individual capacity but solely as trustee for RMTP Trust, Series 2021 Cottage-TT-V, and hereby requests that all notices given or required to be given in these cases, and all papers served or required to be served in these cases, be given to and served upon the following:

FRIEDMAN VARTOLO, LLP
Attorneys for Rushmore Loan Management Services, LLC as Servicer for U.S. Bank National Association, not in its individual capacity but solely as trustee for RMTP Trust, Series 2021 Cottage-TT-V
1325 Franklin Avenue, Suite 160
Garden City, NY 11530
bankruptcy@FriedmanVartolo.com

PLEASE TAKE FURTHER NOTICE that the foregoing demand includes all pleadings of any kind including, without limitation, all notices, motions, complaints and orders, whether written or oral, formal or informal, however transmitted, related in any way to the debtor, its property or its estates. The persons listed above request that their names and addresses be added to the mailing matrix.

PLEASE TAKE FURTHER NOTICE that neither this Notice of Appearance and Demand for Service of Papers nor any later appearance, pleading, proof of claim, claim, or suit shall constitute a waiver of (i) the right to have final orders in non-core matters entered only after de novo review by a District Judge, (ii) the right to trial by jury in any proceeding triable in this case or any case, controversy, or proceeding related to this case, (iii) the right to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal, (iv) any objection to the jurisdiction or venue of this Court for any purpose other than with respect to this Notice, (v) an election of remedy, or (vi) any other right, claim, defense, setoff, or recoupment, in law or in equity, under any agreement, all of which are expressly waived.

Dated: 6/27/2022

By: /s/ Lauren Moyer
Lauren Moyer, Esquire
FRIEDMAN VARTOLO LLP
Attorneys for Movant
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Garden City, New York 11530
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FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE:	Michael William Croutz and Christen Marie Croutz Debtors	Case No. 1:20-bk-01617-HWV
		Chapter: 13
	Rushmore Loan Management Services, LLC as Servicer for U.S. Bank National Association, not in its individual capacity but solely as trustee for RMTP Trust, Series 2021 Cottage-TT-V Movant v.	Judge: Henry W. Van Eck
	Michael William Croutz and Christen Marie Croutz Jack N Zaharopoulos – Trustee, Respondents	

CERTIFICATE OF SERVICE OF NOTICE OF APPEARANCE

The undersigned counsel for Rushmore Loan Management Services, LLC as Servicer for U.S. Bank National Association, not in its individual capacity but solely as trustee for RMTP Trust, Series 2021 Cottage-TT-V (“Secured Creditor”) certify that, on the date stated hereon, I caused to be served a copy of the Notice of Appearance filed on behalf of Secured Creditor on the parties in the manner specified on the attached service list.

The type(s) of service made on the parties was: electronic notification or first-class mail, postage pre-paid. Where service is by electronic notification, the address of the party is listed for identification purposes only.

EXECUTED ON: 6/27/2022

FRIEDMAN VARTOLO, LLP.
By: /s/ Lauren Moyer
Lauren Moyer, Esquire
FRIEDMAN VARTOLO LLP
Attorneys for Movant
1325 Franklin Avenue, Suite 160
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Service by NEF

Trustee

Jack N Zaharopoulos (Trustee)
Standing Chapter 13 Trustee
8125 Adams Drive, Suite A
Hummelstown, PA 17036

Debtor's Counsel

Gary J Imblum
Imblum Law Offices, P.C.
4615 Derry Street
Harrisburg, PA 17111

Asst. U.S. Trustee

United States Trustee
228 Walnut Street, Suite 1190
Harrisburg, PA 17101

Service by First-Class Mail

Debtors

Michael William Croutz
aka Michael W Croutz
204 S Queen Street
Shippensburg, PA 17257

Christen Marie Croutz
aka Christen M. Croutz
fka Christen Marie Laughman
204 S Queen Street
Shippensburg, PA 17257